

IN THE UNITED STATES DISTRICT COURT
FOR THE SOTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ARTIS ELLIS,

Plaintiff,

VS.

EDUCATIONAL COMMISSION OF
FOREIGN MEDICAL GRADUATES,

Defendant.

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CIVIL ACTION NO.

4:14-cv-02126

**DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL
GRADUATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT**

Defendant Educational Commission for Foreign Medical Graduates ("ECFMG") files this Unopposed Motion for Extension of Time to File Answer or Otherwise Respond to Plaintiff Artis Ellis's Original Complaint and in support states:

1. Plaintiff filed this Complaint on July 24, 2014, alleging claims of discrimination and retaliation based on the American's with Disabilities Act, as amended, ("ADAAA"), the Texas Commission on Human Rights Act ("TCHRA"), and the Family and Medical Leave Act ("FMLA").

2. Defendant's agent, CT Corporation, was served by process server on August 8, 2014. Defendant's Answer is currently due on August 29, 2014.

3. The undersigned counsel has been retained and is in the process of investigating the claims alleged against Defendant and requests additional time to file an appropriate response. Defendant and counsel for Defendant did not receive notice of service until ten days after service on Defendant's agent.

4. Defendant requests an additional seven (7) days, or until September 5, 2014, within which to answer or otherwise respond to Plaintiff's Complaint.

5. Counsel for Defendant has contacted counsel for Plaintiff and is authorized to state that Plaintiff has no objection to this requested extension.

6. This extension will not impact any other deadlines in this matter and is being sought not for delay only, but so that justice may be done.

WHEREFORE, ECFMG respectfully requests that this Court enter an Order granting it an additional seven (7) days, or until September 5, 2014, within which to answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

/s/ Stefanie R. Moll

Stefanie R. Moll
State Bar No. 24002870
Federal ID No. 22861
Erin E. O'Driscoll
State Bar No. 24041610
Federal ID No. 582983
Morgan Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, Texas 77002-5006
(713) 890-5000 - Telephone
(713) 890-5001 - Facsimile

ATTORNEYS FOR DEFENDANT
EDUCATIONAL COMMISSION FOR FOREIGN
MEDICAL GRADUATES

CERTIFICATE OF CONFERENCE

Counsel for Defendant and Plaintiff's Counsel conferred on August 27, 2014 regarding this Motion and Plaintiff's counsel stated that he is not opposed to the relief sought herein.

/s/ Stefanie R. Moll
Stefanie R. Moll

CERTIFICATE OF SERVICE

Counsel for Defendant hereby certifies that a true and correct copy of the above and foregoing document has been forwarded to all counsel of record though CM/ECF on 28th day of August, 2014.

Terrence B. Robinson
Brian J. Levy
Kennard Blankenship Robinson P.C.
5433 Westheimer, Ste. 825
Houston, Texas 77056

/s/ Stefanie R. Moll
Stefanie R. Moll